

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Southern Division)**

CAMERON JEFFERSON,)	
)	
Plaintiff,)	Case No.: 8:17-cv-00243 TDC
)	
v.)	
)	
SELECT PORTFOLIO SERVICES,)	
INC., <i>et al.</i> ,)	
)	
Defendants.)	

REPLY IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS

Defendants, Select Portfolio Servicing, Inc. ("SPS") and BWW Law Group, LLC ("BWW"), through undersigned counsel, Eckert Seamans Cherin & Mellott, LLC, and pursuant to Fed. R. Civ. P. 12(b)(6), submit the following Reply Brief and in support thereof state as follows:

Defendants' Motion requests this Court dismiss this matter as the Plaintiff's claims are precluded by the doctrines of *res judicata* and/or collateral estoppel and because even if they were not, they fail to state a claim as pled. Instead of responding to the arguments made by Defendants in their Motion, the Plaintiff has filed a sixteen page document which purports to be an Order and Judgment executed by the Plaintiff. The filing does not contest the arguments made in the Motion that the claims asserted in the Complaint are precluded pursuant to the doctrines of *res judicata* and/or collateral estoppel. The filing does not explain why Plaintiff believes his statutory claims are not barred by the relevant statute of limitations. The Plaintiff's filing does not explain how the Complaint asserts any claims to relief that are plausible on their face. As such, this Court should grant the Defendants' Motion as uncontested.

Despite the fact that the Plaintiff chose to file his Complaint in this venue, he now apparently questions the authority of this Court, accuses it of conspiring with the Defendants to

commit crimes against the United States and to declare war on the United States of America, and requests this matter be transferred to the Court of International Trade. In fact, the Plaintiff's Order and Judgment specifically requests that "No further action will be taken on this matter" and instructs "the Clerk will close the FILE and all cases within it." Docket No. 16 at 14. Defendants consent to such a request and ask this Court to dismiss the Complaint per Plaintiff's request.

Finally, Plaintiff's re-filing of a Complaint alleging claims which have already been dismissed with prejudice, his failure to appear at a telephone hearing before this Court, and his repeated filings in which he aggressively threatens to file additional lawsuits against the undersigned, this Court and other federal officials, show his complete lack of respect for the judicial system and this Court. He clearly is not interested in prosecuting any particular claims and instead is using this Court in an effort to annoy and harass the Defendants in the hope that it will forestall a foreclosure case that is in the Circuit Court for Prince George's County. Such conduct violates Rule 11, is not proper under the rules of this Court, and the Court should not allow this conduct to continue.

WHEREFORE, the Defendants move this Court to enter an Order dismissing the Complaint with prejudice.

Respectfully submitted,

ECKERT SEAMANS CHERIN & MELLOTT, LLC

By: /s/ Daniel A. Glass

Daniel Glass (#28730)

Edward J. Longosz, II (#07509)

1717 Pennsylvania Avenue, NW, Suite 1200

Washington, DC 20006

Tel: (202) 659-6600

Fax: (202) 659-6699

dglass@eckertseamans.com

elongosz@eckertseamans.com

Counsel for Defendants, Select Portfolio

Servicing Inc. and BWW Law Group, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of June 2017, I filed the foregoing **Reply in Support of Defendants' Motion to Dismiss** on CM/ECF, which sent a notice of such Electronic Filing (NEF) to the following counsel of record:

Adam Kaplan, Esquire
BWW LAW GROUP LLC
6003 Executive Boulevard, Suite 101
Rockville, MD 20852
Co-Counsel for Defendant,
BWW Law Group LLC

and served via first-class mail, postage pre-paid to:

CAMERON JEFFERSON
11509 Brigit Court
Bowie, MD 20720
Plaintiff, *pro se*

/s/ Daniel A. Glass

Daniel A. Glass